

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Tether and Bitfinex Crypto Asset Litigation

Case No. 19-cv-9236 (KPF)

ORAL ARGUMENT REQUESTED

**NOTICE OF PLAINTIFFS' MOTION FOR  
CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL**

PLEASE TAKE NOTICE that, upon this motion dated August 5, 2025, the Amended Memorandum of Law in Support of Plaintiffs' Motion for Class Certification and Appointment of Class Counsel dated January 22, 2025 (ECF No. 592-3), the supporting Declaration of Andrew R. Dunlap dated January 10, 2025 (ECF No. 587), the supporting exhibits thereto, and the accompanying Reply Memorandum of Law in Support of Plaintiffs' Motion for Class Certification and Appointment of Class Counsel, Plaintiffs Matthew Script, Benjamin Leibowitz, Jason Leibowitz, and Pinchas Goldshtain respectfully move this Court, before the Honorable Katherine P. Failla, United States District Judge, Southern District of New York, at the courthouse thereof, 40 Foley Square, New York, NY 10007, on a date and time to be set by the Court, for an Order certifying a Class and Sub-Class pursuant to Federal Rule of Civil Procedure 23(b)(3) and appointing Selendy Gay PLLC and Schneider Wallace Cottrell Kim LLP as Co-lead Class and Sub-Class Counsel.

DATED:   New York, New York  
          August 5, 2025

SELENDY GAY PLLC

By: */s/ Andrew R. Dunlap*

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*Co-Lead Interim Class Counsel*

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*Co-Lead Interim Class Counsel*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served on all parties through their counsel of record via the Court's CM/ECF system, on August 5, 2025.

/s/

*Andrew R. Dunlap*

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Andrew R. Dunlap